

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

15-780 M

X
UNITED STATES OF AMERICA

- against-

COMPLAINT AND AFFIDAVIT
IN SUPPORT OF ARREST
WARRANTS

JEFFREY HURANT,
 also known as "Jeffrey Davids,"
MICHAEL SEAN BELMAN,
 also known as "Sean Van Sant,"
CLINT CALERO,
EDWARD LORENZ ESTANOL,
 also known as "Eli Lewis,"
SHANE LUKAS,
 also known as "Hawk Kinkaid,"
DIANA MILAGROS MATTOS,
 also known as "Coco Lopez," and
MARCO SOTO DECKER,

M. No. __15-780_____

(T. 18, U.S.C., § 371)

Defendants.

X

EASTERN DISTRICT OF NEW YORK, SS:

Susan Ruiz, being duly sworn, deposes and states that she is a Special Agent with the Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

On or about and between January 1997 and August 2015, within the Eastern District of New York and elsewhere, the defendants JEFFREY HURANT, MICHAEL SEAN BELMAN, also known as "Sean Van Sant," CLINT CALERO, EDWARD LORENZ ESTANOL, also known as "Eli Lewis," SHANE LUKAS, also known as "Hawk Kinkaid," DIANA MILAGROS MATTOS, also known as "Coco Lopez," and MARCO SOTO DECKER (collectively, the "Defendants") conspired to use facilities in interstate commerce with the intent to promote,

manage, establish, carry on and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, namely an enterprise involving the prostitution in violation of the laws of the State of New York that criminalize various acts of prostitution and the promotion of prostitution, and thereafter committed or attempted to commit an act to otherwise promote, manage, establish, carry on and facilitate the promotion, management, establishment, and carrying on of such unlawful activity in violation of Title 18, United States Code, sections 1952(a)(3) and (b)(1).

(Title 18, United States Code, Section 371).

The source of your deponent's information and the grounds for her belief are as follows:¹

1. I am a Special Agent with the Department of Homeland Security, Homeland Security Investigations (HSI). I have been employed by HSI as a Special Agent since 2010. During my employment with HSI, I have participated in numerous investigations involving crimes related to violations of immigration laws. Among other things, I have conducted or participated in physical surveillance and consensual recordings. I have deployed confidential informants, executed search warrants, and analyzed immigration files, passports, and various petitions and applications submitted by individuals seeking immigration benefits. I am currently assigned to the Special Investigations Unit, which handles investigations on a variety of matters including illegal prostitution.

2. I have personally participated in the investigation of the offenses discussed below. I am familiar with the facts and circumstances of this investigation from: (a) my personal

¹ Because this complaint is submitted for the limited purpose of establishing probable cause, I have not set forth each and every fact learned during the course of the investigation.

participation in this investigation and (b) reports made to me by other law enforcement authorities.

II. RENTBOY.COM

3. RENTBOY.COM is a commercial male escort advertising site that promotes prostitution. RENTBOY.COM was founded in 1997 and advertises itself to be the “original and largest male escort service online.” Escorts pay fees to advertise sexual services on the site. Customers may then contact the escorts directly to arrange meetings.

4. RENTBOY.COM advertises that they receive approximately 500,000 unique visitors each day, about 70 percent of whom access the site from the United States. There are several thousand advertisements on RENTBOY.COM. Between 2010 and 2015, RENTBOY.COM had over \$10 million in gross proceeds.

5. JEFFREY HURANT is the chief executive officer of RENTBOY.COM and the remaining Defendants are employees whose activities promote RENTBOY.COM and further illegal prostitution.

A. RENTBOY.COM WEBSITE

6. While RENTBOY.COM has disclaimers that the advertisements on the site are for companionship only and not for sexual services, RENTBOY.COM is designed primarily for the advertisement of sexual services; the advertisements on RENTBOY.COM are clearly for sexual services; and RENTBOY.COM's owner and employees have made statements that the site's purpose is for facilitating illegal prostitution.

7. RENTBOY.COM takes its name from a British slang term for a male prostitute. (The Merriam-Webster Dictionary definition for rent boy is “a usually young male prostitute.”)

8. RENTBOY.COM’s slogan is “Money can’t buy you love . . . but the rest is negotiable.”

9. RENTBOY.COM’s primary business is conducted through its website at www.rentboy.com. When a user navigates to the website www.rentboy.com, they are asked to accept a set of Terms of Service. The terms of service state that “This site may not be used for the advertising of sexual services or to engage in activities requiring the payment of money for sex or other illegal activities.” However, as set forth below, the entire website is designed for the purpose of advertising prostitution.

10. After a user has accepted the terms of service, they arrive at the RENTBOY.COM homepage. The homepage features advertisements for featured escorts,² including new escorts and escorts who have recently updated their advertisements. There is also a navigation button that allows a user to search for escorts. A user may search by a number of parameters including geographic location. A search displays short advertisements for prostitutes that meet the user’s parameters in the form of escort truncated profiles.

11. A user can then click on a particular escort’s truncated profile to see their full profile. As detailed further below, escort profile pages generally detail the sexual acts each escort is willing to perform and the price. They often also contain nude pictures and indications relating to their penis size. In addition, profile pages sometimes have links to a separate website

² RENTBOY.COM primarily refers to the prostitutes advertising on the site as “escorts.”

called DADDYSREVIEWS.COM that contains explicit reviews of the escorts written by previous customers.

12. RENTBOY.COM makes money through payments from escorts for advertisements on the site and to a smaller degree by offering advertising for products. RENTBOY.COM offers four different advertisement levels to escorts: classic, gold, platinum, and diamond. The more expensive advertisement levels move the placement of the escort's profile up in searches. The price for advertisements depends on the type of advertisement and the escort's location. Advertisements can range in price from \$59.95 for a one month Classic advertisement to \$299.95 for a one month Platinum advertisement. Diamond advertisement prices are based on an auction system and can cost significantly more than other types of advertisements. In addition, escorts can bid for a "powerboost" that will move their ad to the top of the searches for a predetermined time.

13. An escort manages their advertisements by logging into the RENTBOY.COM site through a special account page solely for escorts. When an escort sets up an advertisement with RENTBOY.COM, the top of the page states: "Make a profile, field calls and emails, count your money." The escort can enter a small amount of text. In addition, there are several categories pre-programmed into the advertisement by RENTBOY.COM that the escort is asked to select options for. In the "Physical Attributes" category, the escorts are asked to select answers for the attributes: "Foreskin," "Cock Size," and "Build." The escorts are asked to provide in the "Preferences" category their "Sexual Orientation," "Safe Sex," and "Sexual Position."

14. The escort profile page also has a pre-defined list of "Primary Interests" that an escort can check off to denote sexual acts that they are willing to perform. In addition, if the

mouse cursor is placed over the title of an interest, a description appears. The RENTBOY.COM escort profile page lists the following “Primary Interests” and descriptions.

Vanilla:	Straight and tidy, clean and “nice” sex, with as little foreplay as possible. The opposite of kinky, not in any way involved with B/D or S/M.
Oral:	Pleasuring another person with one’s mouth, especially cocksucking or a ‘blowjob’.
Leather:	Dressing up in leather fetish gear, possibly involving bondage, discipline, or S/M role play.
S&M:	Sexual gratification in the infliction of pain or suffering upon or by another person.
Shaving:	A fetish for smooth skin. Shaving pubic hair, chest, or armpits can create new, exciting, sometimes prickly sensations.
Watersports:	Sexual activity in which urine (pee) is involved. Taking the piss out of your lover.
Scat:	Sex play involving shit. A rare treat for the connoisseur only, unless there is a sudden and involuntary “mudslide.”
Kissing:	Old-fashioned lips together, “making out,” or sucking face
Anal:	Activity involving the anus, asshole, or butt play.
Sneakers:	Enjoys athletic shoes and especially and feet of an athlete.
B&D:	Bondage and Discipline involving handcuffs, rope, etc. “Whip me, beat me, make me write bad checks!”
Spanking:	Slapping on the buttocks with a bare hand, paddle, or belt. “He gave the brat a good spanking.”
Diapers:	A fetish practice where an adult role plays at being an infant.
Role Playing:	Imitating a fantasy character, like a policeman, priest, football coach, or cheerleader. A great way to let loose and step outside your normal self.
Toys:	Dildos, vibrators, cockrings, clothespins, or other objects used for sex or role-play. Please, don’t try light bulbs!

Feet:	Admiration and attraction to a person's bare feet, inspiring worship and care.
Fisting:	To place much of the hand, or the entire hand, into the bunghole. Maybe even up to the elbow.
Latex:	Erotic play wearing rubber costumes, gear, or toys. "Wanna go scuba diving?"
PNP:	Party and Play means using drugs with sex. Beware addictive substances, poor judgment, and hangovers!

15. The profile page also has required fields for the "Escort's In Rate," "Escort's Out Rate," "Escort's Overnight Rate," and "Escort's Weekend Rate." The rates are generally listed in amount of United States Dollars per hour. Based on my training and experience, I am aware that in a prostitution business, the term "Escort's In Rate" refers to the amount that a customer must pay to engage in a sexual act with a prostitute at a location controlled by the prostitute (such as the prostitute's apartment or hotel room). The term "Escort's Out Rate" refers to the amount that a customer must pay to engage in a sexual act with a prostitute at a location controlled by the customer (such as the customer's apartment or hotel room). The term "Escort's Overnight Rate" refers to the amount that a customer must pay to have the prostitute spend the entire night with the customer and engage in sexual acts.

16. When searching for an escort, a user can filter by a number of categories, including penis size, whether the penis has foreskin or not, sexual position, whether the escort only performs sex with a condom and the "Primary Interests" described above.

17. RENTBOY.COM includes a disclaimer about what content may be included in advertisements. Next to the advertisement text box is a disclaimer that says "Guidelines for text in your listing: Text cannot include the following: Offers of sexual conduct in

exchange for money; Explicit sexual conduct expected as part of your time; Offers or references to illegal drugs, illegal drug paraphernalia, or illegal use of drugs, and Slanderous, violent, or unprofessional text.” The disclaimer indicates that “All new uploads and listing content as well as any changes made to your listing, must be approved by our customer service team.” The disclaimer further states that “Any violations of text approval guidelines risk permanent removal from the site.”

18. In promotional materials, RENTBOY.COM states that “RENTBOY.COM’s behind -the-scenes team includes customer service reps, telemarketing and sales staff, marketing and event managers, accountants, graphic designers and computer programmers. The stars of RENTBOY.COM are the rentboys themselves. As with any successful business, quality control is key. Site administrators screen each escorts photo, phone number, and credit card number to confirm validity. They also encourage clients to post reviews of the rentboys on their sister site, RENTBOYREVIEWS.COM.”

B. RENTBOY PROFILES

19. Profiles on RENTBOY.COM are clearly advertising payment in connection with sexual services. At a given time there are hundreds of advertisements for escorts in New York City on RENTBOY.COM and thousands across the United States. Those advertisements regularly refer to sexual acts, sexual paraphernalia, and penis size in both their text portions and in the portions required by RENTBOY.COM. For example, in July 2015, the following profiles appeared on RENTBOY.COM:

20. A profile for “Brandon,” advertising services in Brooklyn, New York stated that he is “hairy handsome versatile & uninhibited.” The profile noted that he was willing to have

Brooklyn incalls and had a “sling and rimchair.” Based on my investigation, I have learned that a sling, also known as a “sex sling,” is a device that allows two people to have sex while one is suspended and a rimchair is a seat resembling a raised toilet seat designed so that that anus is accessible while someone is sitting on the seat. I have also learned that “rimming” refers to the touching of the tongue to the anus. Brandon’s profile also identified that his “cock size” is “large” and that his “foreskin” is “cut.” In addition, Brandon’s profile on RENTBOY.COM included a link to DADDYSREVIEWS.COM. DADDYSREVIEWS.COM is a website that features reviews of prostitutes by their customers. The link on Brandon’s profile takes a user to 10 reviews of Brandon’s sexual performance. The reviews indicate the sexual acts that Brandon engaged in with each reviewer and the price that each customer paid for one hour with Brandon.

21. A profile for “Kit Hammond” advertising services in Brooklyn, New York stated “come and meet me for my hot body and hard cock and make a friend too while you are at it.” The advertisement indicated that he was “61 165lbs 8in cut cock with cool feet.” The advertisement listed his “in rate,” “out rate,” and weekend rate as \$150 an hour.

22. A profile for “Master Lebeau” advertising services in Brooklyn, New York stated “10 irresistible inches // long & strong” and that he was available for “role play, watersport sessions” and “domination.” The advertisement also identified that his “cock size” is “extra large” and “foreskin” is “cut” and indicated that his “sexual position” is “top.” The advertisement listed his “out rate” as \$230, his overnight rate as \$1500 and his weekend rate as \$3500.

23. A profile for “Ryan Raz,” advertising services in Manhattan, New York stated: “I have a very innocent shy mid-west look, but once you get me behind closed doors it’s an amazing experience . . . I love bottoming but am also very versatile . . . there are a number of

reviews for me out there so if you wish to find them I am certain you will be happy with the results.” The advertisement lists his “cock size” as “average” and his “foreskin” as “cut.” It also lists his “in rate” and “out rate” as \$300. An interview with “Ryan Raz” was also featured by RENTBOY.COM. The interview is branded as a “RentboyTalk” and starts with the logo for RENTBOY.COM. In the interview, “Ryan Raz” says that the first time that he escorted someone said to him “have you ever thought about making some extra cash.” Raz explained that he was going to receive \$250 and that the man “was not someone he would normally . . . meet,” but after doing it he found that it was “so easy.” Raz also said regarding escorting that “you have to be able to turn something off up here [pointing to his head] in order to really please someone and enjoy what you’re doing.”

24. A profile for “Drillá” advertising services in Manhattan, New York stated that he is an adult film performer and said “excellent messages, body, hung well and fully functional, erotic, sensual, and very sexual . . . I am a business that provided unlimited pleasure.” The advertisement noted that his “cock size” was “extra large” and his “foreskin” was “cut.” It also included his “sexual position” as “top” and listed numerous “primary interests,” as described above. The advertisement stated that his “in rate” was \$250 an hour, his “out rate” was \$300 and hour, his overnight rate was \$1,000 and up and his weekend rate was \$2,500 and up.

25. A profile for “Rick,” advertising services in Manhattan, New York stated that he was “an all American boy next door who loves to have a good time.” It said “My stats are 62, 160, bubble butt, well hung thick and completely versatile.” The advertisement noted his “cock size” as “large” and his “foreskin” as “cut.” It also included a list of the “Primary Interests” he had, as described above. In addition, the advertisement provided his “in rate” and “out rate” as \$200 and his

overnight rate as \$1000. The advertisement also stated “Here’s a link to my reviews” and contained a link to a DADDYSREVIEWS.COM page containing 10 reviews of Rick. The reviews identified numerous sexual acts that Rick performed with customers. The most recent reviews also stated the rates that the customers paid, which were consistent with the rates listed on Rick’s RENTBOY.COM profile.

26. A profile for “Killian James,” advertising services in Houston, Texas stated “I’m a vanilla bottom and a sensual or dominant top.” It listed his “cock size” as “large” and his “foreskin” as “cut.” It also said: “I come highly recommended. Take some time to read my reviews” and included a link to a page at DADDYSREVIEWS.COM that contained 24 reviews. The reviews note explicitly the sexual acts performed by James during each meeting with a customer.

C. HOOKIES

27. As a promotional tool, RENTBOY.COM holds a yearly awards show for the “International Escort Awards,” which it refers to as the Hookies. On March 20, 2015, RENTBOY.COM hosted the 9th Annual Hookies at the XL Outnyc hotel located at 516 West 42nd St., New York, New York. They advertised the show as “recognizing 17 categories of covering all aspects of the oldest profession as presented in the newest media.” I am aware that prostitution is often referred to as “the oldest profession.”

28. During the course of the show, escorts who advertise on RENTBOY.COM received awards in a variety of categories. Those categories included “best twink,” “best top,” “best bottom,” and “best cock.” I am aware that the term “twink” is a slang term for a young, gay man with an effeminate manner, thin build, and no body or facial hair. I am aware that “bottom” is a slang

term for a sexually submissive partner. I am aware that “top” is a slang term for a sexually dominant partner.

29. The nominees and winners of the awards were escorts who advertised on RENTBOY.COM.

D. RENTBOY.COM OWNERSHIP

30. RENTBOY.COM is controlled by EASY RENT SYSTEMS, INC, which does business as RENTBOY.COM. EASY RENT SYSTEMS, INC., which is sometimes also referred to as EZ RENT SYSTEMS, is a New York corporation whose President and Chief Executive Officer is JEFFREY HURANT. HURANT has been the chief executive officer since its incorporation. EASY RENT SYSTEMS, INC. has offices at 6 West 14th Street, Suite 4W, New York, New York. The mailbox for that address has the name “Easy Rent System” followed by the names “J. Hurant” and “Sean Van Sant.” As set forth below, Sean Belman, also known as “Sean Van Sant,” is the director of RENTBOY.COM.

31. The domain name RENTBOY.COM was registered on January 18, 1996. Public records indicate that the registrant name is Easyrent Systems located at 6 West 14th Street. The Administrator Name is identified as Jeffrey Davids at Easy Rent Systems, Inc., with the email address jeff@rentboy.com.

32. On April 2, 2002, EASY RENT SYSTEMS, INC. applied to the United States Patent and Trademark Office for a trademark on the name RENTBOY.COM. The application also includes an affidavit signed by HURANT, which identifies him as the President of EASY RENT SYSTEMS, INC. The RENTBOY.COM website has a copyright notice that the copyright is owned by EASY RENT SYSTEMS, INC.

33. RENTBOY.COM allows payment for advertisements in cash at its office, money order, and credit card. However, RENTBOY.COM does not have an internet credit card processing system. Rather, to pay by credit card an escort must fill out a 'Credit Card Authorization Form' and send it by fax or email to RENTBOY.COM. The 'Credit Card Authorization Form,' which is provided on the RENTBOY.COM site has the name EASY RENT SYSTEMS, INC. at the top and states 'I, [blank]____, authorize Easy Rent Systems, Inc. to charge my credit card listed below for the following services:'

34. BRAVE NEW TELEMEDIA, INC. is a New York corporation. HURANT is the Principal Executive Officer of BRAVE NEW TELEMEDIA, INC. On a monthly basis, BRAVE NEW TELEMEDIA received payments from EASY RENT SYSTEMS, INC. and then makes payments to an internet service provider located in Virginia that provides services relating to the RENTBOY.COM domain. The internet service provider's records identify HURANT as the Primary Technical Officer at BRAVE NEW TELEMEDIA.

E. JEFFREY HURANT, RENTBOY CEO

35. JEFFREY HURANT is the President and Chief Executive Officer of RENTBOY.COM. HURANT has frequently given interviews about RENTBOY.COM.

36. In a 2010 videotaped interview HURANT identified himself as 'Jeffrey Davids, the founder and president of RENTBOY.COM.' In a 2008 videotaped interview, HURANT was identified as 'Jeffrey Davids, the owner of RENTBOY.COM.' HURANT stated that he started the site because he felt that 'escorts were a disenfranchised group' and that there

were “a lot of hookup sites, a lot of sex sites, but for escorts nothing.” He said that he went to Oxford University and learned that “rentboy” was “the word for escorts.”

37. HURANT has also told reporters that “Rentboy was designed from the start to showcase the working boys of the world and to help you find someone to spend your evening with—and then to say goodbye” and that “We just want to keep the oldest profession in the world up to date with all the latest technology.”

38. HURANT was present at the 2015 HOOKIES, where he provided an undercover agent a card with the RENTBOY.COM name on one side. On the opposite side the card says “Jeffrey Davids, Principal.” It also lists his email address as “cyberpimp@rentboy.com.” HURANT was asked by the undercover agent how the Hookies awards started. HURANT responded “Have you ever had sex with anyone and it was so good, you had to tell someone? That’s what it’s all about!”

39. HURANT has also made statements about his attempts to skirt laws that prohibit the promotion of prostitution. In one interview, he stated “There is no place on this website where somebody says I’ll have sex for money because that is against the law. We can talk about what you look like, what you are, what you like to do, what people say about you in bed . . . People say I’m a great top, people say I fuck like nobody’s business, but you can’t say I’ll fuck you for two hundred bucks.”

F. OTHER RENTBOY.COM EMPLOYEES

40. RENTBOY.COM employed over a dozen people during the time of its operation. There is probable cause to believe that anyone employed by the organization was aware that its aim was the promotion of prostitution, based on its publicly-disseminated

advertising and promotional material and the content of the site itself. The remaining defendants are or were RENTBOY.COM employees, whose involvement with the website is set forth in detail below.

MICHAEL SEAN BELMAN, also known as "Sean Van Sant"

41. From at least April 2010, BELMAN has been employed by Easy Rent Systems.³ He is currently identified in RENTBOY.COM promotional material as the Marketing Director of RENTBOY.COM. In interviews, BELMAN is sometimes described as the "U.S. head of Rentboy.com." His name is listed on the mailbox for RENTBOY.COM headquarters in Manhattan.

42. BELMAN has given numerous interviews in which he made clear that he was aware that RENTBOY.COM promoted prostitution. In one interview, BELMAN stated that 'Rentboy.com does more than any other website to promote a sunny, sex-positive attitude toward escorting' and that 'Escorts are not just sex objects; they are real people performing a valuable service.' In an interview relating to the HOOKIES, BELMAN referred to the prize winners who advertise on RENTBOY.COM as "sexual therapists." BELMAN was present at the 2015 HOOKIES.

43. BELMAN has also acknowledged RENTBOY.COM's attempts to shield itself from the illegal conduct it promotes. In an interview, BELMAN incorrectly stated that RENTBOY.COM was legal because: "We say that escorts are selling their time only . . . What happens between you and the escort is up to you. That's the way it's considered legal."

CLINT CALERO

³ BELMAN is currently using the name "Sean Van Sant." I have compared pictures from BELMAN's driver's license to pictures of "Sean Van Sant" from RENTBOY.COM's promotional materials and determined that they are the same person.

44. CALERO is a Senior Sales Agent at RENTBOY.COM. In a government filing, RENTBOY.COM described his job as the creation, implementation and management of campaigns to increase and/or reverse attrition and help build healthy relationships with our customers. CALERO's job duties include answering phone calls related to customer issues and traveling to worldwide RENTBOY.COM events.

45. CALERO also sends emails to escorts who advertise on RENTBOY.COM on behalf of RENTBOY.COM. The emails advertise sales for escorts whose ads have lapsed on RENTBOY.COM, opportunities to work at RENTBOY.COM events in exchange for free ads, and sales for advertisements on another site operated by EASY RENT SYSTEMS, INC. CALERO's emails end with a Steve Martin quotation: "I believe that sex is one of the most beautiful, natural, and wholesome things that money can buy."

EDWARD LORENZ ESTANOL, also known as "Eli Lewis"

46. LORENZ ESTANOL is an escort who worked at RENTBOY.COM as a Social Media Coordinator until approximately May 2014.⁴

47. As of July 2015, LORENZ ESTANOL had an active advertisement on RENTBOY.COM. The ad included a subtitle that said: "This boy is a bottom." The advertisement included his "sexual position" as "bottom," "cock size" as "average" and his "foreskin" as "uncut." In

⁴ LORENZ ESTANOL used the name "Eli Lewis" in connection with his prostitution. I have compared pictures from LORENZ ESTANOL's driver's license to pictures from "Eli Lewis" promotional material and interviews and determined that they are the same person.

addition, his “primary interests” were listed as “vanilla, kissing, oral, anal, leather, and shaving.” The advertisement listed his in rate and out rate as \$300 an hour, his overnight rate as \$1400 and his weekend rate as \$3000. The advertisement also included a link to DADDYSREVIEWS.COM.

48. The DADDYSREVIEWS.COM page linked to the advertisement included five reviews by customers who had hired LORENZ ESTANOL to have sex with them. The reviews included the price paid by the customer and the sexual acts that the customers had engaged in with LORENZ ESTANOL.

49. LORENZ ESTANOL maintains a personal website, “DEEP INSIDE ELI” at www.EliLewisOnline.com, which can be accessed by clicking on a link on his RENTBOY.COM ad. In an April 2013 post on that site, LORENZ ESTANOL explained that escorting is a great way to explore your sexuality and get paid doing it. LORENZ ESTANOL referred to RENTBOY.COM as the “leading social networking website for escorts and masseurs. The site receives a lot of heavy traffic from all over the world and is the most well-known platform from which potential clients can hire their fantasy by the hour”. ESTANOL also referred to DADDY’S REVIEWS as the “Yelp of Escorting”. ESTANOL was nominated for the 2015 HOOKIES award for “Best Boyfriend Fantasy” and “Best Website.”

SHANE LUKAS, also known as “Hawk Kinkaid”

50. LUKAS is presently the Chief Operating Officer at RENTBOY.COM and EASY RENT SYSTEMS, INC., positions he took over in April 2014.⁵ LUKAS is also the founder of Hook Online, a non-profit online resource for men in the sex trade. LUKAS has said

⁵ LUKAS is currently using the name “Hawk Kinkaid.” In one interview, LUKAS identified that the name “Hawk Kinkaid” was an alias. I have compared photographs from LUKAS’ driver’s license to images of “Hawk Kinkaid” in RENTBOY.COM promotional materials and in videotaped interviews and determined that they are the same person.

that he initially became involved with RENTBOY.COM after reaching out to RENTBOY.COM with respect to his work for Hook Online.

51. LUKAS has stated in interviews that he was formerly a prostitute. LUKAS has said in interviews that he became involved in prostitution when he needed additional money to support himself during an internship.

52. While LUKAS says that “time is what a Rentboy sells,” he routinely refers to RENTBOY.COM and escorts as part of the “sex industry.” LUKAS says that the business “is about smart sex selling.” LUKAS has also done interviews with RENTBOY.COM escorts in which the escorts discuss the fact that they have sex with their clients. In another interview, LUKAS talked about the importance of escort reviews in the escort industry and specifically mentions DADDYSREVIEWS.COM as one such site. LUKAS said in the interview that the nature of the client reviews affects the amount of money that an escort can charge.

DIANA MILAGROS MATTOS, also known as "Coco Lopez"

53. MILAGROS MATTOS was a Sales Account Manager at EASY RENT SYSTEMS, INC. from September 2009 to June 2015.⁶ She was the highest commissioned sales agent leader in sales for five years in a row. She also mentored and trained new sales agents.

54. During her time at RENTBOY.COM, MILAGROS MATTOS maintained a twitter account in which she identified herself as the "escort whisperer." She offered to help escorts boost their social media profile, so that they increased the amount of business they received. MILAGROS MATTOS regularly posted messages on her twitter account relating to RENTBOY.COM escorts. In one message she stated "Wanna write a glowing review for an #escort #rentboy? Visit DaddysReviews.com! Respected, legit site for male #escortreviews! @rentboy." MILAGROS MATTOS also posted on forums at DADDYSREVIEWS.COM using the name "Coco Lopez."

MARCO SOTO DECKER

55. SOTO DECKER is an accountant who handled EASY RENT SYSTEMS, INC.'s books and records from 2012 until the present.

56. In September 2010 and March 2013, EASY RENT SYSTEMS, INC. applied to the United States Department of Homeland Security, Citizenship and Immigration Services for an H-1B non-immigrant work visa on behalf of SOTO DECKER.⁷ The application identified that EASY RENT SYSTEMS, INC. runs RENTBOY.COM which "revolutionized the

⁶ MILAGROS MATTOS also uses the name "Coco Lopez." I have compared driver's license photographs of MILAGROS MATTOS to pictures of "Coco Lopez" and determined that they are the same person.

⁷ The 2010 application was signed by Jeffrey Hurant for EASY RENT SYSTEMS, INC. The 2013 application was signed by Michael Sean Belman, who was identified as the EASY RENT SYSTEMS, INC marketing director.

escorting industry by moving it online and away from agencies and disreputable bars.” The application also said that SOTO DECKER had been operating as the accountant from July 2012, a position that reported directly to JEFFREY HURANT and which required him to prepare all financial statements and to strategically analyze, manipulate, and interpret financial data “in order to develop strategies and make recommendations critical for the CEO to utilize in his work to successfully manage and grow the company.”

57. In connection with the application, EASY RENT SYSTEMS, INC. also submitted a job offer letter addressed to SOTO DECKER dated July 20, 2012, which identified the duties and responsibilities of his position. Among those duties was meeting with marketing, IT, sales, and customer service staff to review monthly expenses and see revenue and expenses optimization; supervising the company’s daily e-commerce transactions; managing the entire accounting, budgeting and reconciliation process for the company’s events, including the HOOKIES.

58. The application also included some of EASY RENT SYSTEMS, INC.’s books and records. Among the expenses identified was a listing for “Viagra–Sean.” In addition, the application included numerous articles about RENTBOY.COM. Many of those articles identified unambiguously that the escorts advertising on RENTBOY.COM were having sex with their customers in exchange for money.

59. SOTO DECKER was one of the points of contacts for Cogent Communications. In some communications with Cogent, SOTO DECKER described himself as HURANT’s assistant.

60. SOTO DECKER was also a signatory on one bank account associated with EASY RENT SYSTEMS, INC.'s event business. The only other signatories on accounts related to EASY RENT SYSTEMS, INC. were HURANT and HURANT's mother.

III. NEW YORK STATE LAW

61. New York State has a number of laws criminalizing prostitution and the promotion of prostitution. Specifically, New York Penal Law Section 230.25 provides that "A person is guilty of promoting prostitution in the third degree when he knowingly . . . advances or profits from prostitution by managing, supervising, controlling or owning, either alone or in association with others, . . . a prostitution business or enterprise involving prostitution activity by two or more prostitutes." New York Penal Law Section 230.20 provides that "A person is guilty of promoting prostitution in the fourth degree when he or she knowingly . . . advances or profits from prostitution." New York Penal Law Section 230.00 provides that "A person is guilty of prostitution when such person engages or agrees or offers to engage in sexual conduct with another person in return for a fee."

WHEREFORE, your deponent respectfully requests that the defendants JEFFREY HURANT, MICHAEL SEAN BELMAN, also known as "Sean Van Sant," CLINT CALERO, EDWARD LORENZ ESTANOL, also known as "Eli Lewis," SHANE LUKAS, also known as "Hawk Kinkaid," DIANA MILAGROS MATTOS, also known as "Coco Lopez," MARCO SOTO DECKER be dealt with according to law. Your deponent also requests that this affidavit and the associated arrest warrants be sealed until further order of the Court. If the

defendants were aware that there were warrants for their arrest, they may flee or take measures to destroy evidence.

S/ Susan Ruiz

Susan Ruiz
Special Agent
United States Department of Homeland
Security, Homeland Security Investigations

Sworn to before me this
18th day of August, 2015

S/ Viktor Pohorelsky

THE HONORABLE VIKTOR V. POHORELSKY
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK